J. Angus Edwards (USB #4563)
JONES WALDO HOLBROOK & McDONOUGH
170 South Main Street, Suite 150
Salt Lake City, UT 84101
Aedwards@joneswaldo.com

Telephone: (801) 534-7465 Fax: (801) 328-0537

Attorneys for Defendant SATTERFIELD HELM MANAGEMENT INC.

## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF UTAH CENTRAL DIVISION – STATE OF UTAH

Defendant Satterfield Helm Management, Inc. dba Valley Fair Mall ("Satterfield") and Sparky's LLC, by and through their counsel, hereby stipulate and move the Court under Federal Rule of Civil Procedure 6(b)(1)(A) for entry of an Order extending the deadline for Satterfield to respond to the Complaint from March 25, 2014, *see* Dkt. No. 6, to April 11, 2014. Satterfield has requested an extension while it waits for a decision from its insurance carrier, but Satterfield

will file a responsive pleading by April 11, regardless of whether a decision has been made by the carrier. Therefore, good cause exists for the relief sought.

A proposed Order Granting Stipulated Motion for Extension of Time to Respond to Complaint is submitted herewith.

DATED this 31<sup>st</sup> day of March, 2014.

JONES WALDO HOLBROOK & McDONOUGH

/s/ J. Angus Edwards

J. Angus Edwards Attorneys for Defendant SHATTERFIELD

/s/ Dustin R. Matthews (signed with permission)

Attorney for Plaintiff

## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 31<sup>ST</sup> day of March, 2014, I caused true and correct copy of the foregoing **STIPULATED MOTION FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT** to be electronically filed and served via the Court's electronic notification upon the following:

Dustin R. Matthews 506 South Main Street, Suite 101 Bountiful, UT 84101 Attorney for Plaintiff

Adam Kenji Richards RAY QUINNEY & NEBEKER 36 South State Street, Suite 1400 Salt Lake City, UT 84111 Attorneys for Defendant Utah Pretzel, L.C.

/c/	Iο	Ann	Gregory	
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## **EXHIBIT A**